

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER M. GALLIGAN,

Plaintiff,

v.

ADTALEM GLOBAL EDUCATION INC.,
f/k/a DEVRY EDUCATION GROUP;
ADTALEM GLOBAL HEALTH, INC. f/k/a
DEVRY MEDICAL INTERNATIONAL,
INC.; ROSS UNIVERSITY SCHOOL OF
MEDICINE SCHOOL OF VETERINARY
MEDICINE (ST. KITTS) LIMITED; and
DOES 1 THROUGH 50

Defendants.

Case No. 1:17-cv-06310

Hon. Joan H. Lefkow

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Defendants Adtalem Global Education Inc. (ATGE), Adtalem Global Health, Inc. (AGH), and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (RUSVM), by and through its attorneys and pursuant to Federal Rules of Civil Procedure 12(b)(6), submits this Motion to Dismiss Plaintiff's Amended Complaint and, for the reasons stated in the accompanying memorandum of law, respectfully moves to dismiss Plaintiff's Amended Complaint against Defendants with prejudice.

DATED: November 20, 2017

Respectfully submitted,

ADTALEM GLOBAL EDUCATION INC.;
ADTALEM GLOBAL HEALTH, INC.; ROSS
UNIVERSITY SCHOOL OF MEDICINE
SCHOOL OF VETERINARY MEDICINE
(ST. KITTS) LIMITED

By: s/ Brian Stolzenbach

Brian Stolzenbach
bstolzenbach@seyfarth.com
Megan E. Troy
mtroy@seyfarth.com
SEYFARTH SHAW LLP
233 S. Wacker Drive, Suite 8000
Chicago, IL 60606
Telephone: (312) 460-5000
Facsimile: (312) 460-7000

CERTIFICATE OF SERVICE

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 20th day of November, 2017:

Michael W. Ford, Esq.
Law Offices of Michael W. Ford
4 Timberwood Lane
Riverwoods, IL 60015
mfordski@aol.com

Emil T. Bayko
Porter Hedges LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
tbayko@porterhedges.com

s/Brian Stolzenbach